

FILED ENTERED  
LODGED RECEIVED

AUG 10 2015 RE

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

Instructions for use:

1. Check the above box "Highlight Fields" to show fields on this form.
2. Complete the form.
3. Print, sign the document, and file with the court.

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON

Okolie Edmund

15-CV-01258 RAJ

Plaintiff(s)

vs.

Seattle Police Department

City of Seattle

Defendant(s),

COMPLAINT

- (1) Violation of my human and civil rights
- (2) False and illegal arrest
- (3) Mental abuse and traumatization
- (4) False and illegal seizure, etc.

Parties to this Complaint:

Plaintiff's Name, Address and Phone Number

Okolie Edmund  
435 Martin Luther King Jr. Way So  
Seattle WA 98144  
(206) 391-6762

Defendant's Name, Address and Phone Number

(1) Seattle Police Dept.  
610 5th Ave.  
Seattle, WA 98124  
(206) 625-5011

(2) City of Seattle  
601 Fifth Ave.  
Seattle, WA 98104  
(206) 684-2489

Defendant's Name, Address and Phone Number

Summons not issued - JPP AP

Defendant's Name, Address and Phone Number

(If you have more defendants, list them using the same outline on another piece of paper.  
Attach additional sheets, if necessary)

**Jurisdiction**

(Reason your case is being filed in federal court)

(1) Both the Plaintiff and defendant are US citizens  
(2) Both reside in the same city, County of King  
and the same State of Washington

**Statement of Claim:**

(State here as briefly as possible the facts of your case.)

\* See the next pages 1-5.

## 1 UNITED STATES DISTRICT COURT

## 2 WESTERN DISTRICT OF WASHINGTON

3 Statement of claim;

4 -----

5 The Police misconducts in this case manifest gross abuse and violation of my human  
6 and civil rights in pursuit of Racial profiling, stereotyping, malice, efforts to criminalize ,  
7 dehumanize and mentally abuse the innocent citizens whom they are employed and  
8 deemed to protect, etc.

9 I filed this case with the United States District Court and jury to adjudicate the actions  
10 of the Seattle police after many months of agonizing racing thoughts about the incident  
11 without any other option in mind:

## 12 FACTS

13 On October 17, 2014 I was driving home on Rainier Avenue. As I  
14 approached Alaska Street, I saw a police light behind me. I slowed  
15 down and moved quietly to a traffic safe corner street by the right  
16 and stopped.

17 A lady officer approached me and I asked her, "Officer, what did I do" She responded  
18 with her own question,

19 "How much have you been drinking", I responded, "I have not had even a drop of beer  
20 for at least one month"

21 She asked for my driver's license and insurance. I gave her my driver's license and as I  
22 was looking for my insurance when she disappeared.

23 After about two minutes, I saw about five Seattle police officers surrounding me like a  
24 criminal. They took me out from my car, searched me, and seized all my belongings on  
25 me, including my cell phone by order. The police officer competed in taking turns  
26 to test me; they performed about five five tests and asked me to recite the Alphabets  
27 from A to Z and backwards from Z to A.

28 I told them that though I am educated, my brain was not equipped to perform such an  
29 academic test at that circumstance.

1 They ordered me to blow into a plastic pipe to the best of my ability. They commanded  
2 me with hands motion as I blew into the pipe," Come on!, Come on !,Come on !" I got  
3 exhausted and stopped.

4 One of the officers told me as they shared eyes communication among them, "You  
5 tested positive for Chemicals" I place my palm in my chest and asked, " Myself! ?" The  
6 officer said, "Yes!?" He ordered me to put my hands behind my back. I did as he  
7 commanded and he handcuffed me. They booked me their car. While in the police car, I  
8 asked the riding officers for the opportunity to call my children to pick up my car. They  
9 denied my request and said, "They will take good care of it".

10 They took me to the South precinct Station and booked into the dungeon without a  
11 toilet;

12 THE INHUMANE TREATMENTS: DEHUMANIZATION AND MENTAL ABUSES;

13 While in the dungeon, I made several disciplined attempts to be allowed the opportunity  
14 to use the rest room. I was ignored.

15 I was left to stay in my feces and urines, less than an animal. One short police officer  
16 who passed by while I was tapping the door with my hand cuffs behind me, passed by  
17 while looking at the opposite side of my dungeon.

18 After many hours, two police officers came by my door and ordered me out to their car. I  
19 told them that I was in my mess with my feces and urine. They looked at each other and  
20 used eyes language to communicate their intention. Thus, they ignored me in my  
21 hopeless and helpless plight, got into the car and drove off.

22 They took me in the car from the open space into a room through a garage door. I almost  
23 got into a shock and fainting spell; thinking that they were going to kill me. I caught my  
24 breadth as the garage door opened again to another open space and the street. Yet, I did  
25 not know where they were going with me, a disabled man in hand cuffs. While on I-5  
26 North, I felt assured in public to ask them where they were going with me. One of the  
27 officers responded, "Hospital" They took me to the Harborview Hospital.

28 AT THE HARBORVIEW MEDICAL CENTER:

29 They paraded me into Emergency Room in hand cuffs with drenched pant in feces and  
30 urine like a criminal that lacks human dignity.

31 The .E.R. patients looked at me pitifully. One patient in bed asked me," Bro what did you  
32 do?" I answered," I don't know"

1 While one officer removed the hand cuffs from my hands, the other officer approached  
2 and discussed secretly with a male nurse who beckoned me. I then asked the male  
3 nurse, "What did they tell you that I *did*?" *The nurse told me, "D W I, they want me to*  
4 *draw blood from you"* I then told the nurse, "THAT IS ABSOLUTELY FALSE"

5 *The nurse proceeded to draw my blood which he handed over to them. After the Hospital*  
6 *visit, they took me to my address without handcuffs.*

7 *As they dropped me off in my home, I was given a small zip lock parcel with my very few*  
8 *medications, my spare car key, my driver's license and few Dollars collected from my*  
9 *pocket and my cell phone.*

10 I then asked them about my car and the key to my residence. They told me that my car  
11 has been seized and towed away for D W I according to the law of Washington State, and  
12 that I should call a lock smith for entry to my residence. Thus had no choice but, to stay  
13 under the freezing cold weather until day break when my son was available to let me in.

14 MY FILED COMPLAINTS WITH THE MAYOR AND CITY POLICE CHIEF:

15 I filed complaints with the Mayor and the chief of police of Seattle notifying them of the  
16 abuses and violation of my human and civil rights, towing costs, property damage, etc.

17 The chief of police responded in kind, but the mayor's office did not respond.

18 THE 67 PAGES OF THE POLICE REPORT:

19 When the police report of 67 pages came out, it depicted false cover and write ups to  
20 back their stereo type and prejudice. However, my blood work was negative of any drug  
21 or alcohol, like ALL the tests performed by the police on site.

22 THE SEATTLE MUNIPAL COURT'S HEARINGS;

23 Consistent with malicious and incriminating police agenda, some upsetting, false charges  
24 were filed against me by the Seattle Municipal Court based on the false police falsehood.

25 After about three court hearings, the truth came to light. Thus, the court dismissed all  
26 the charges "for the interest of justice. "

27 MY INITIAL PARTIAL CLAIM FORWARDED TO THE CITY OF SEATTLE;

28 I filed a partial claim with the City for some damages to my car and the towing cost to  
29 refund my borrowed money for redeeming my towed car; the City turned my claim to  
30 the Risk Management who responded with urban cowboy ideology, dusted off the claim  
31 and blamed me for drunkenness; blame the victim.

1 QUESTIONS, REMARKS AND ARGUMENTS:

2 It is very degrading and disgraceful that some police officers recruited to protect the  
3 citizens resort to criminalize, clamp on their human and civil rights, instill fears and  
4 restlessness in them, racial profile them, cripple their future, restrict their freedom of  
5 movement and even kill them without justifiable reasons.

6 QUESTIONS :

7 (1) Search and Seizure; By searching my car, what was the officer searching for? Was  
8 even a trace of the item (s) found? Exhibit?

9 (2) The tests conducted by the police ; As all the tests performed yielded negative  
10 results, why then was I arrested?

11 (3) What chemicals did the officer accuse me of being positive for? Was the accusation  
12 true? Where is the Exhibit?

13 (4) Why did all the rest of the officers at the scene collaborate in the activities or kept  
14 mute?

15 (5) Why did the Police officers mentally abuse and traumatize me while their custody ?

16 Who, in this our civilized society cannot recognize a drunk or drug addict? It is very  
17 unbelievable that many people recruited, trained to protect all lives are turning against  
18 our universally recognized values and the constitutional guarantees of all our citizens  
19 with impunity.

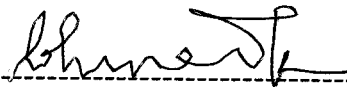
20 All the abuses point to the evils of racism, stereotype, hatred carried on by the people  
21 recruited and paid by the citizens to protect them , but who vow to pursue their evil  
22 ideologies to divide and criminalize them based their hidden agenda, race and inherent  
23 hatred of others. It is noteworthy that these kinds of misconducts have damaged the  
24 records, the life opportunities, dignities, reputations and future aspirations, etc. of many  
25 innocent citizens

26 RELIEF REQUESTED.

27 The harm has been done and irreversible; the abuses have been inflicted and mental  
28 agony with racing thoughts and indelible flash backs reign beyond my imagination. The  
29 recognition and prevention of these evil acts in our midst is paramount in preservation  
30 of our human, civils rights, dignity, freedom and justice for all Americans

31 The Relief requested include but not limited to the following:

- (1) Compensation in the sum of 2. 5 million Dollars ( \$2,500,000.00) ,or the amount found to be equitable by the judge and or jury for the violations of my human and civil rights,, mental abuses and traumatization, false and illegal arrest, illegal seizure and impound , deprivation of my right to my property, etc.
- (2) Compensation for the damages to my vehicle; broken windshield and the transmission
- (3) Compensation for the lost items in my vehicle.
- (4) Payment of my attorney fees, all court fees , etc, where and when applicable.
- (5) JURY DEMAND; I humbly request for the case to be tried by jury.

 Date 08/10/15.

Okolie, Edmund C. ( Pro se )

435 Martin Luther King Jr Way So

Seattle, WA. 98144

Ph. 206-391-6762.